

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

CHANSAVATH THIPPRACHACK (01)

No. 4:15-MJ-

179

CRIMINAL COMPLAINT

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief:

**Alleged Offense:**

On or about December 12, 2014, in the Northern District of Texas, Fort Worth Division, the defendant, **Chansavath Thipprachack**, having been convicted of a crime punishable by imprisonment for a term in excess of one year, did knowingly and unlawfully possess in and affecting interstate and foreign commerce the following firearm: Ruger, Model P95, 9mm-caliber semi-automatic pistol, serial number 317-04296, in violation of 18 U.S.C. § 922(g)(1).

**Probable Cause:**

I, Special Agent Robert Looper, affiant, under oath, duly state that I am a special agent in the Bureau of Alcohol, Tobacco, Firearms, and Explosives, assigned to the Fort Worth Field Office in the Dallas Field Division. The statements set forth in this affidavit are true and correct to the best of my knowledge and belief.

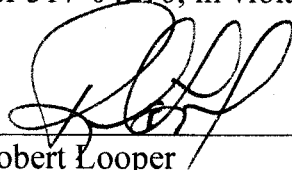
1. On or about December 12, 2014, the Fort Worth Police Department obtained a state arrest warrant for **Chansavath Thipprachack (Thipprachack)** for an alleged aggravated robbery with a deadly weapon. On that same day, Fort Worth police received information that **Thipprachack** was looking to leave the metroplex and was currently in a Toyota Land Cruiser parked at a laundromat around the 4500 block of Northeast 28 Street in Haltom City.

2. Officers pulled into the laundromat parking lot in marked cars and saw **Thipprachack** in a Toyota Land Cruiser backed in on the north side of the building. They initiated a felony stop and ordered **Thipprachack** to show his hands and get out of the car. After repeated commands, **Thipprachack** got out of the car, but ran east around the side of the building. Before **Thipprachack** turned the corner, an officer saw him throw three plastic bags on the ground. An officer later retrieved the bags and field tests indicated they contained methamphetamine.
3. The officers chased **Thipprachack** down an alley on the east side of the building, yelling their identities as Fort Worth police and commanding him to stop running. Other officers ran to the south side of the building to cut off **Thipprachack's** escape. Realizing the officers trapped him, **Thipprachack** turned to one set of officers and took what appeared to them as a fighting stance. Fearing **Thipprachack** could have a deadly weapon due to the nature of the arrest warrant, an officer struck **Thipprachack's** nose with his elbow, which distracted **Thipprachack** enough to allow the officer to take **Thipprachack** to the ground.
4. **Thipprachack** continued to resist and disobey commands to place his hands behind his back. After some struggle, the officers forced **Thipprachack's** hands behind his back and placed handcuffs on him.
5. After taking **Thipprachack** into custody, they conducted an inventory search of the Land Cruiser before having it towed to impound. Inside the center console, wrapped in an orange bandana, officers found a Ruger, Model P95, 9mm-caliber semi-automatic pistol, serial number 317-04296. Attachments A-C are pictures of the Ruger found in the center console. Officers also found marijuana and other drugs in the car, a digital scale, 5-\$100 bills, 10-\$20 bills, and numerous small bags commonly used to package small quantities of drugs for distribution. Attachment D is a picture of the drugs, money, and drug-trafficking paraphernalia found in the car.
6. On December 23, 2014, I interviewed **Thipprachack** at the Tarrant County Central Detention Center. I read him his *Miranda*, which he understood and voluntarily waived. He told me that on December 12, 2014, he was the sole occupant of the Land Cruiser, which belongs to his mother. He admitted to possessing the Ruger and the drugs. He told me he had bought the Ruger the day before his arrest from a guy named "Eddie." He explained that "Eddie" had owned him money for

hydrocodone pills he had sold "Eddie" and the gun was to apparently settle that debt.

7. I am also a trained expert on the manufacture of firearms and ammunition. I examined the Ruger firearm and determined it was not manufactured in Texas. Thus, before December 12, 2014, the Ruger firearm had travelled in interstate or foreign commerce to reach Texas.
8. Fingerprint Identification Expert R. Robertson with the Fort Worth Police Department compared **Thipprachack's** fingerprints taken at his December 12, 2014, arrest to fingerprints on certified records reflecting **Thipprachack's** prior Dallas County, Texas, felony conviction from December 2004 for methamphetamine possession. Robertson said the fingerprints are from the same person.

Based upon the above facts and circumstances, I believe there is probable cause to believe that **Thipprachack**, a convicted felon, did knowingly and unlawfully possess, in and affecting interstate or foreign commerce, a Ruger, Model P95, 9mm-caliber semi-automatic pistol, serial number 317-04296, in violation of 18 U.S.C. § 922(g)(1).



Robert Looper  
Special Agent  
Bureau of Alcohol, Tobacco, Firearms, and Explosives

SWORN AND SUBSCRIBED before me, at 11:00 <sup>am</sup>/pm, this 21<sup>st</sup> day of April, 2015.



JEFFREY L. CURETON  
UNITED STATES MAGISTRATE JUDGE



GOVERNMENT'S  
ATTACHMENT

A

U.S. v. Thipprachek



GOVERNMENT'S  
ATTACHMENT

B

U.S. v. Thipprachack



GOVERNMENT'S  
ATTACHMENT

5

U.S. v. Thipprachack



GOVERNMENT'S  
ATTACHMENT

D

U.S. v. Talipchack